

1 The Honorable Mary K. Dimke
2

3 Paul J. Triesch, WSBA #17445
4 Keating, Bucklin & McCormack, Inc., P.S.
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10 UNITED STATES DISTRICT COURT
11 EASTERN OF WASHINGTON
12 AT YAKIMA
13

14 YADIRA CONTRERAS, ERICA
15 KRONECK, KYLE OLSON, AND
16 HENDRY ("CODY") RODMAN III,
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18 Plaintiffs,
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20 v.
21 HERITAGE UNIVERSITY,
22

23 Defendant.
24

25 No. 1:22-CV-3034-TOR

26 DECLARATOIN OF PAUL J.
27 TRIESCH

28 Paul Triesch certifies and declares:

29 1. I am over the age of eighteen years, competent to testify and I
30 have personal knowledge of the facts stated herein.

31 2. I serve as defense counsel to Heritage University in this action.

32 3. Appended as Exhibit 1 is a true and correct copy of a list that
33 shows payments to PA students from July 2020.

34 4. Appended as Exhibit 2 is a true and correct copy of my May 6,
35 2025 email to Courtroom Deputy Cora Vargas regarding the payments made
36 in Exhibit 1.

37 DECLARATOIN OF PAUL J. TRIESCH - 1
38 1:22-CV-3034-TOR
39 1476-00008/751877 (002)

40 KEATING, BUCKLIN & MCCORMACK, INC., P.S.
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45 FAX: (206) 223-9423

1 I declare under the penalty of perjury under the laws of the State of
2 Washington that the foregoing is true and correct.

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4 Dated this 6th of May 2025 at Yakima, Washington.

5 KEATING, BUCKLIN & McCORMACK, INC., P.S.
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7 By: /s/ Paul J. Triesch
8 Paul J. Triesch, WSBA #17445
9 Attorney for Defendant *Heritage University*
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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiffs

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DATED: May 6, 2025

/s/ Lindsey E. Martin

Lindsey E. Martin, Legal Assistant